EISENBERG FILL SITE
NORTH KANSAS CITY, MO.

BROWNING & ASSOCIATES, INC.
ENVIRONMENTAL CONSULTANTS

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BROWNING & ASSOCIATES, INC.
Environmental Consultants

February 13, 1996

Ms. Julie Kelsey
Environmental Specialist
Missouri Department of Natural Resources
Division of Environmental Quality
P.O. Box 176
Jefferson City, MO 64112

Re: Eisenberg Fill Site
North Kansas City, MO
EPA/MDNR No. MOD985768175

Dear Ms. Kelsey:

Enclosed please find a copy of a work plan developed by our firm to ascertain the type and extent of contamination at the above-referenced site. In our conversations, I indicated that my client, R.H. Johnson, was very eager to investigate the site and begin remediation, if necessary. The enclosed work plan should allow us to begin this process.

Please review the enclosed and call me directly with any comments. I encourage you or other representatives of the Missouri Department of Natural Resources (MDNR) to be present during the excavation process. By way of a copy of this letter, we are forwarding a copy of the work plan to Mr. David Crawford, United States Environmental Protection Agency (EPA), for his comments as well. Mr. Crawford is also encouraged to be present during the excavation process. The work plan may be modified should the information we requested from the MDNR and EPA be received.

Due to certain restrictions placed upon my client, time is of the essence. Your prompt rely or comments will be greatly appreciated. We would like to begin the field activities the week of February 19, and will coordinate the exact time and date with all interested parties.

Thank you for your assistance.

Sincerely,
BROWNING & ASSOCIATES, INC.

William R. Browning

WRB/jms
enc.

cc: Mr. David Crawford, EPA Region VII
Mr. James Regan, Vertex Engineers
Ms. Jennifer Fehlan, UNUM
Mr. Jeff Clayton, RH Johnson

WORK PLAN

for

INVESTIGATION AND PHASE II ENVIRONMENTAL SITE ASSESSMENT

LEO EISENBERG SITE
16th AND INTERSTATE 35
NORTH KANSAS CITY, MISSOURI

Prepared for:

MR. JEFF CLAYTON
RH JOHNSON COMPANY
801 WEST 47th STREET, SUITE 219
KANSAS CITY, MISSOURI 64112

Prepared by:

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Kansas City, Kansas
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February 1996

William R. Browning

TABLE OF CONTENTS

LIST OF TABLES

LIST OF FIGURES

1.0 INTRODUCTION AND HISTORY

1.1 INTRODUCTION

Browning & Associates, Inc. was retained by Mr. Jeff Clayton of the RH Johnson Company (RHJ) to conduct an investigation/Phase II environmental site assessment of the thirty (30) acres of property bound by 16th Street to the south, Interstate 35 (I-35) to the west, and a railroad yard to the east which is located in North Kansas City, Missouri (subject site herein). The subject site is referred to as the Leo Eisenberg site by both the Missouri Department of Natural Resources (MDNR) and the United States Environmental Protection Agency (EPA). Figure 1 illustrates the location of the subject site.

The subject site is comprised of two distinct areas. The south approximate 10 acres is currently being used/leased by the MoKan Container Service (MoKan) for the purposes of storing/staging over-the-road trailers used in local deliveries. The northern approximate 20 acres is currently undeveloped.

1.2 HISTORY

According to MDNR records, the subject site was first discovered on February 8, 1989 by the EPA. The EPA completed a Preliminary Assessment (PA) pursuant to their investigation. According to the Site Investigation (SI2) performed by the MDNR, the MDNR visited the subject site in 1989, 1993, 1994, and 1995, without the knowledge of the owner.

B&A reviewed the MDNR file on February 5, 1996, and requested that certain technical sections of the file be copied and forwarded to B&A's Kansas City office. This information has not been received as of this writing.

B&A also requested of the EPA to review their file on the subject site, or that a copy of the file be forwarded to B&A's Kansas City office. To date, the EPA data has not been received.

The 10 acres occupied by MoKan was the focus of the original MDNR investigation. In April 1988, the EPA responded to a call from the North Kansas City Fire Department concerning several pools of an unknown liquid reportedly oozing from an area near the intersection of 16th Street and I-35. In a subsequent inspection by the EPA, inspectors found three (3) pools of a dark stained water. The location of the pools were in what is now the northeastern corner of the MoKan area.

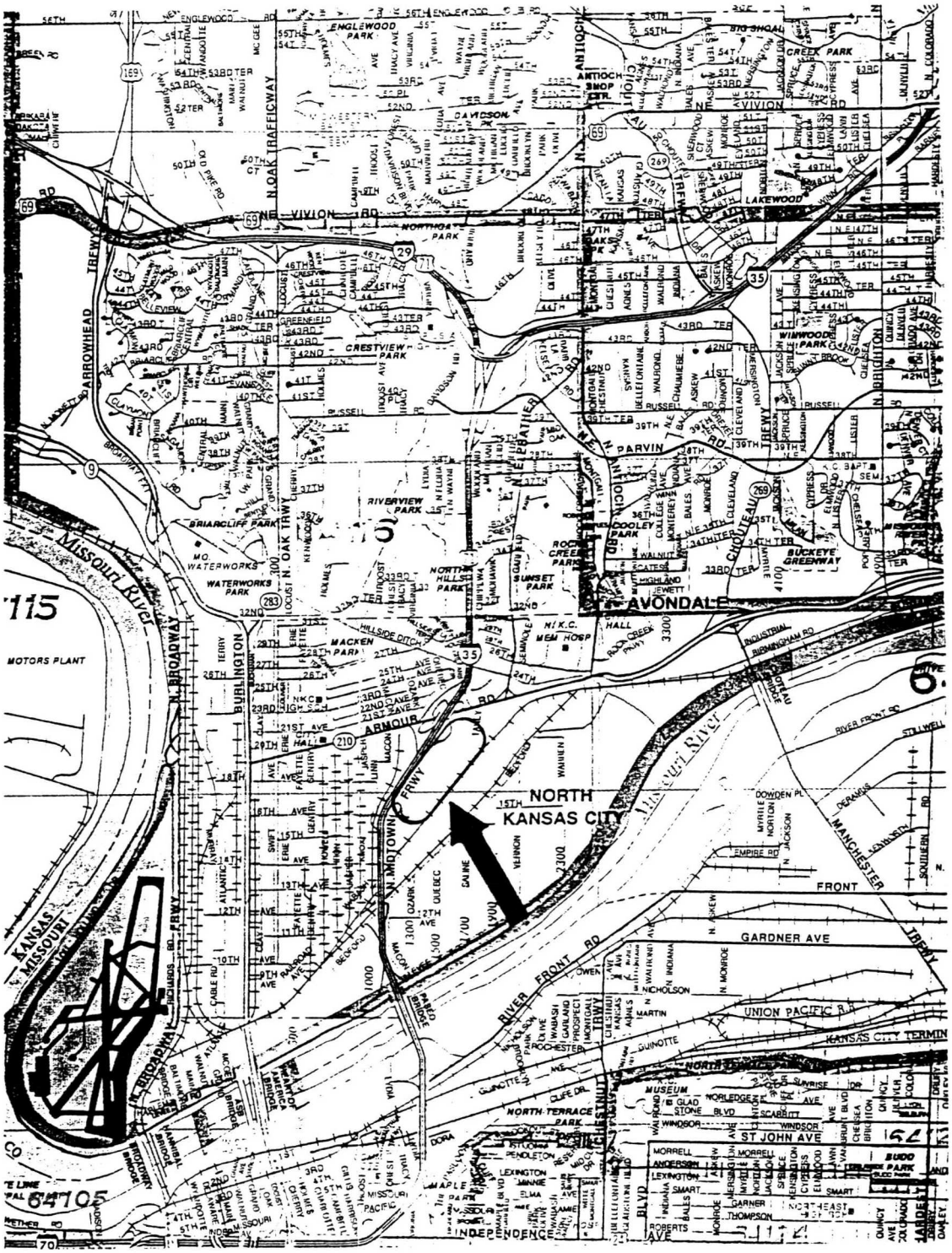

FIGURE 1. GENERAL LOCATION MAP SHOWING SITE

BROWNING & ASSOCIATES, INC.

The EPA collected a sample of the water and had it analyzed for organic pollutants and metals. The results of the EPA analysis are presented in Table 1.

The MDNR first investigated the site on July 25, 1989. During the original Site Investigation (SI) the MDNR noted two (2) shallow pools of stained water. The MDNR collected samples of the water and a sample of the fill underlying the pool. A reference sample of the fill was also collected. Results of the MDNR sampling are presented in Table 2.

On April 27, 1995, the MDNR reinspected (SI2) the subject site and noted recent dumping. The material was reported by the MDNR to be a type of "sludge." The MDNR collected soil samples from the north side of the MoKan area for analysis. The MDNR also collected samples of soil near the I-35 exit ramp for analysis to be used as background or as a comparison to the site sample results. The results of the laboratory analysis area presented in Table 3.

1.3 PURPOSE

The purpose of this investigation is as follows:

- To confirm or deny the existence of contamination which may exist on the site and to what extent
- Characterize the type of fill historically allowed on the site and whether this fill meets MDNR regulations

Table 1. EPA Data from Samples Collected April 6, 1988

Constituent	Pooled Water (ppb)	Benchmark (ppb)
Aluminum	28,000	---
Arsenic	4,400	190
Barium	740	---
Cobalt	150	---
Chromium	500	210
Copper	5,500	12
Iron	43,000	1,000
Manganese	1,800	---
Molybdenum	1,700	---
Nickel	5,000	160
Lead	190	3.2
Titanium	870	---
Vanadium	100,000	---
Zinc	610	110
Calcium	150	---
Sodium	10,000	---

--- Indicates substance was either not present or present below detection limits.

Table 2. MDNR Data from Samples Collected July 25, 1989

Constituent	Pooled Water - Soil (ppb)	Upgradient - Soil (ppb)	Pooled Water (ppb)	SCDM Soil Value (ppb)	SCDM Surface Water (ppb)
Silver	170	72	7.1	2,900,000	0.12
Barium	140,000	200,000	600	41,000,000	---
Cadmium	3,600	2,300	5.7	290,000	1.10
Chromium	10,000	12,000	170	2,900,000	210
Mercury	1,500	850	690	170,000	0.012
Lead	84,000	38,000	180	---	0.08
Selenium	200	120	15	2,900,000	36
Vanadium	85,000	17,000	1,900	4,100,000	---
Benzo(a)anthracene	3,800	---	---	---	---
Benzo(a)pyrene	3,800	800	---	80	---
Benzo(b)fluoranthene	7,400	700	---	---	---
Benzo(ghi)perylene	3,500	---	---	---	---
Bis(2-ethylhexyl)phthalate	600	600	37	42,000	---
Chrysene	5,100	600	---	---	---
Fluoranthene	7,600	800	---	23,000,000	---
Indeno(1,2,3-cd)pyrene	3,000	---	---	---	---
Phenanthrene	3,900	---	---	---	---
Pyrene	9,500	700	---	17,000,000	---

--- Indicates substance was either not present or present below detection limits.

Table 3. MDNR Data from Samples Collected April 27, 1995

Constituent	SCDM Reference Value (ppm)	Background - Soil (ppm)	North Side MoKan - Soil (ppm)
Arsenic, total	0.33	10.5	6.18
Barium, total	41,000	241	25.9
Cadmium, total	290	1.03	ND
Chromium, total	2,900	19.8	33.5
Lead, total	---	32.5	14.3
Selenium, total	2,900	ND	2.79
Vanadium, total	4,100	142	209
2-Methylnaphthalene	---	ND	0.035
Dibenzofuran	---	ND	0.024
Phenanthrene	---	ND	0.086
Fluoranthene	23,000	0.1	ND
Pyrene	17,000	0.073	ND

--- Indicates substance was either not present or present below detection limits.

2.0 PHYSICAL SITE

2.1 LOCATION

The subject site is located on the eastern side of I-35 and north of 16th Street in the city limits of North Kansas City, Clay County, Missouri. The site location is in the approximate center of the SW 1/4 of Section 13, Township 50 North, Range 33 West.

2.1.1 Site Description

The subject site is comprised of two distinct areas. The south approximate 10 acres is currently being used/leased by the MoKan Container Service for the purposes of storing/staging over-the-road trailers used in local deliveries. The northern approximate 20 acres is currently undeveloped.

Historically, the owner of the site has attempted to raise the elevation of the site by allowing fill to be placed on the site. According to Mr. Clayton, the elevation of the subject site has been raised approximately seven feet through this process.

2.1.2 Utility Locate

Mr. Browning contacted the utility locate service 1-800-DIG-RITE on Friday February 9, 1996, in preparation for drilling to begin the week of February 19. The locate company agreed to notify applicable utilities and provided Confirmation No. 401105. The city of North Kansas City water and sewer had to be contacted separately.

2.1.3 Site Access

Prior to preceding to the site, B&A received authorization from Mr. Greg Rhodus, NT Reality, Inc., to be on the premises. Prior to finalizing the draft work plan, B&A walked the entire site on February 12.

2.1.4 Site Geology

According to the Soil Survey book issued January 1996, by the United States Department of Agriculture-Soil Conservation Service, in cooperation with the Missouri Agricultural Experiment Station, the soils underlying the subject site belong to the Leta silty clay series.

The Leta silty clay series consists of deep, nearly level, somewhat poorly drained soils on bottom land of the Missouri River. The surface layer is typically a very dark gray, very firm silty clay about 5 inches thick. The subsurface layer, approximately 9 inches thick, is also very dark gray, very firm silty clay.

The subsoil is a dark grayish brown, very firm silty clay approximately 20 inches thick. The substratum to a depth of approximately 60 inches is stratified light olive brown, dark grayish brown, and grayish brown, friable silt loam and very fine sand loam.

Permeability is generally slow in the upper part of the Leta soil and moderate in the loamy portion. Surface runoff is slow.

Groundwater is estimated to be at a depth close to the surface elevation of the Missouri River.

3.0 PROPOSED WORK PLAN

3.1 EXCAVATION

3.1.1 Fill Investigation

In B&A's conversations with the MDNR, one of the MDNR's concern is the type of fill which has been placed on the site. In an effort to review the material historically placed on the site, B&A proposes to unearth the fill in 10 to 15 locations and document our observations.

B&A proposes to use a front-end loader or backhoe to unearth the fill in 10 to 15 locations and document the material observed. Refer to Figure 2 for the proposed location of the excavated areas.

Photographs of the excavated areas will be taken, and the soil/fill removed from a specific hole will be examined/characterized. Excavated material will be placed on plastic sheets adjacent to the excavation site. Samples of the fill material will be collected and composited for laboratory analysis. The equipment used in the excavation will be decontaminated between excavations sites.

In conjunction with the excavation, B&A proposes to install 3 to 4 monitoring wells across the site for the collection of groundwater samples. Groundwater is to be analyzed for RCRA metals and other as needed. Refer to Figure 2 for the proposed location of the wells.

B&A proposes to start the investigations the week of February 19. Representatives of the EPA and MDNR are encouraged to review the work progress. B&A can be reached at (913) 334-9600.

3.1.2 Subcontractor Selection

B&A utilized the geotechnical/drilling firm of GSI/General Testing, Inc. (GSI) of Kansas City, Missouri to perform the drilling. Pace, Inc. (Pace) was selected to analyze the samples.

3.1.3 Property Access

As previously mentioned, B&A received authorization to drill on the subject site from Mr. Greg Rhodus.

3.1.4 Cuttings and Water Removed

As part of the contract with GSI, 55-gallon drums will be provided in the event noticeable contamination is encountered in soil or groundwater. Contamination (pools of liquid) was not noted during field screening.

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STATE OF MISSOURI
Mel Carnahan, Governor • David A. Shorr, Director
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF ENVIRONMENTAL QUALITY
P.O. Box 176 Jefferson City, MO 65102-0176

February 2, 1996

Mr. Jeff Clayton
R.H. Johnson Company
801 West 47th Street
Suite 219
Kansas City, MO 64112

RE: Eisenberg Fill Site
North Kansas City, Missouri
EPA ID#: MOD985768175

Dear Mr. Clayton:

Please find enclosed a copy of the Eisenberg Fill Second Site Inspection (SI2) report, which you requested. This report was completed in April 1995 under contract to the U.S. Environmental Protection Agency (EPA) Region VII. I have included a copy of the tentative disposition form and transmittal letter from the Missouri Department of Natural Resources (DNR) to EPA.

Additional action was recommended for Eisenberg Fill Site to determine the appropriate regulatory authority to address the past and present disposal activities which have occurred on-site.

The demolition waste from the former Children's Mercy Hospital may be regulated under the Missouri Solid Waste Management Law. Information about the Eisenberg Fill Site has been forwarded to DNR's Solid Waste Management Program (SWMP), so a determination can be made regarding the materials which have been disposed on your property.

If the solid waste entering your property meets the regulatory definition of clean fill (defined as uncontaminated soil, rock, sand, gravel, concrete, asphaltic concrete, cinderblocks, brick, minimal amounts of wood and metal, inert solids), it is unlikely that Eisenberg Fill will require regulation under solid waste authority. After this determination has been made, the Eisenberg Fill Site could be eligible to enter Missouri's Voluntary Cleanup Program (VCP).

The VCP was designed to provide an opportunity for property owners to investigate hazardous contamination on their own properties with state oversight. Should you satisfactorily meet the requirements of a state VCP agreement, it is unlikely that additional action will be necessary under Superfund. Mr. David Crawford, of EPA Region VII, has indicated that he is supportive of the Eisenberg Fill Site entering the VCP.

Questions about Missouri's Solid Waste Management Law can be directed to Mr. Jim Bell, of the SWMP, at (573) 751-5401. I have enclosed information about the VCP. If you have further questions about VCP, you may contact Mr. Jim Belcher at (573) 751-3176.

I appreciated your call and hope this information has proven useful. I have sent a copy of this letter to your consultant, Mr. Bill Browning. If you or Mr. Browning have other questions or need additional assistance, I can be reached at (573)751-3176.

Sincerely,

HAZARDOUS WASTE PROGRAM

Julie B. Kelsey

Julie B. Kelsey
Environmental Specialist

JBK:dal

Enclosures

c: Mr. David Crawford, EPA
Mr. Bill Browning, Browning and Associates
Mr. Jim Belcher, VCP
Mr. Jim Bell, SWMP
Mr. Jim Armes, KCRO

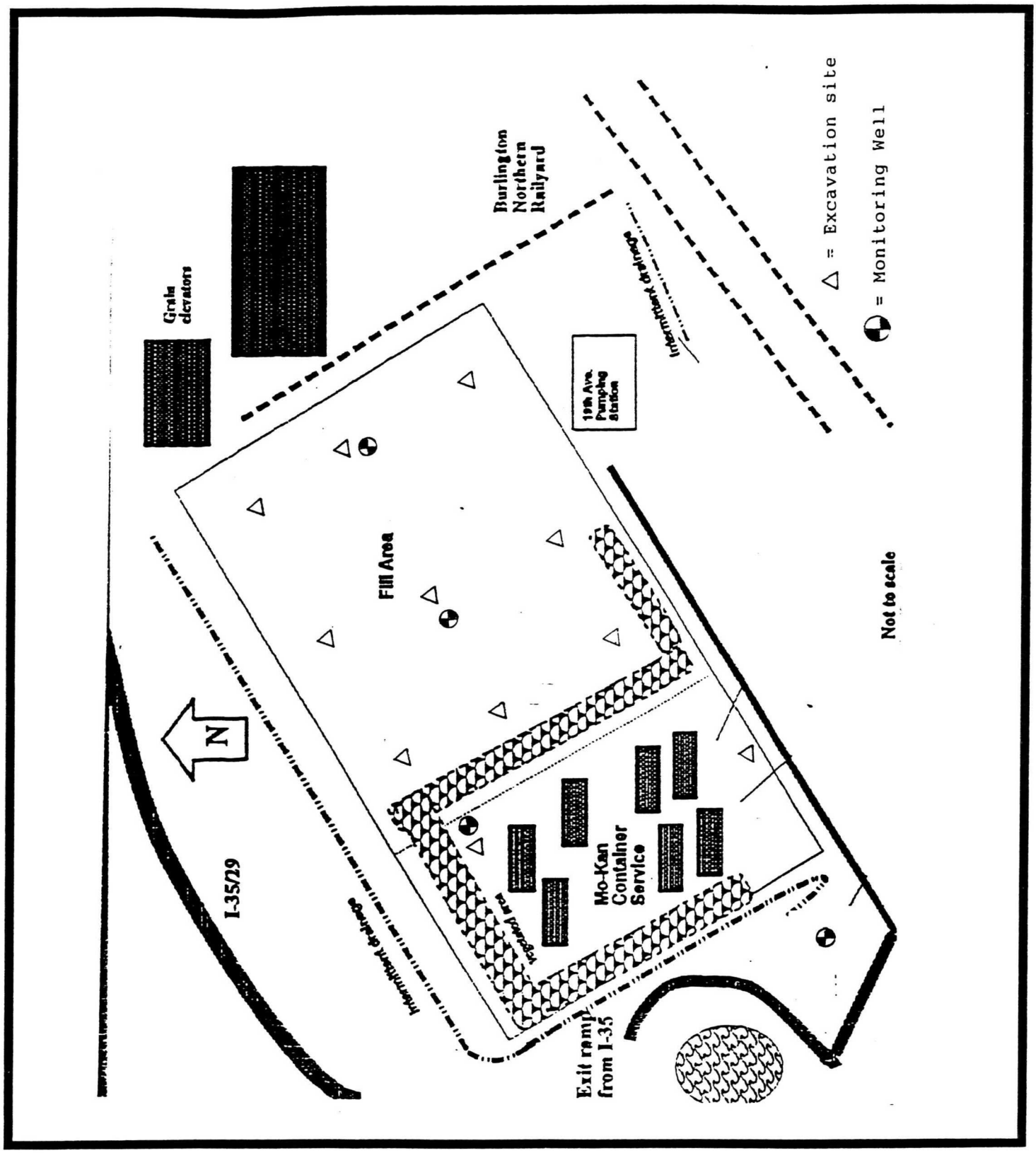

FIGURE 2. PROPOSED EXCAVATION AND MONITORING WELL SITES

BROWNING & ASSOCIATES, INC.

3.2 ON-SITE ACTIVITIES

3.2.1 Safety

As required in their contract, GSI will provide a site Health and Safety Plan for all GSI personnel. B&A will supply a site Health and Safety Plan for its personnel.

3.2.2 General Housekeeping

Due to surface soil conditions, damage/disturbance to the surrounding area will be kept to a minimum. After completion of the excavation and the characterization of the samples, the fill material will be returned to the pit from which it came.

The site will be kept free of other waste and debris resulting from this process.

3.2.3 Decontamination Procedures

All drilling and excavation equipment will be steam-cleaned prior to arrival on site. The excavation and drilling equipment will be steam-cleaned/decontaminated after their use in one location and prior to their subsequent use in a further location to prevent cross-contamination.

All samples will be collected using surgical gloves so as to not contaminate the soil samples. All samples will be placed in sterile containers provided by Pace and then placed in insulated coolers. Samples will be chilled to approximately 4 degrees Centigrade using a combination of Blue-ice and regular ice.

3.2.4 Laboratory Analysis

Soil and groundwater samples will be analyzed, for a minimum, of RCRA metals. Soil and groundwater samples may be analyzed for other constituents, based on the receipt of additional data from the MDNR and EPA.